



121 Champion Way
 Canonsburg, PA 15317

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BUREAU OF AIR REGULATION

November 10, 2009

OVERNIGHT MAIL

Ms. Trina L. Vielhauer, Chief
 Bureau of Air Regulation
 Florida Department of Environmental Protection
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

RE: Comments, Title V permit renewal,
 RRI Energy Florida, LLC - Indian River Plant
 Title V Permit #0090196-011-AV

Dear Ms. Vielhauer:

RRI Energy Florida, LLC submits the following comments for the Indian River Power Plant Title V renewal. The 'intent to issue' notice was published October 16, 2009 in the Florida Today newspaper and comments are due by November 15, 2009.

Permit Section	Draft Permit Language	Corrected Language	Existing Title V permit	Reason/Comments
Statement of Basis; page 1 of 4; 'Processing schedule and related documents'	Additional information Response received 8/25/09.	Additional Information Response received 8/14/09.		Please correct the date to 8/14/09. The additional information requested for the Title V renewal was submitted on 8/14/09. Additional information requested for a different permit issue was submitted on 8/25/09.
Section I, Subsection B, Summary of Emissions Units	#2 fuel oil storage tank (34,500 gallon capacity)	#2 fuel oil storage tank (20,000 gallon capacity)	Unregulated Emissions Units and Activities were not specified in existing Title V permit.	Please correct the capacity of the fuel oil storage tank.
Section I, Subsection B, Summary of Emissions Units	One gasoline fuel storage "Day" tank (500 gallon capacity)	One gasoline fuel storage "Day" tank (1000 gallon capacity)	Unregulated Emissions Units and Activities were not specified in existing Title V permit.	Please correct the capacity of the gasoline storage tank.

Permit Section	Draft Permit Language	Corrected Language	Existing Title V permit	Reason/Comments
Section III, Condition A.30, 'Used Oil'; page 11 of 25	"Reliant Energy" is used 7 times within the body of the conditions.	"RRI Energy, Inc." is the correct company name.		Please use the correct company name (RRI Energy, Inc.).
Appendix ASP, Order on Request for Alternate procedures and Requirements; Page ASP-1 through 10	July 9, 1997 Order on Request in the matter of Florida Electric Power Coordinating Group, Inc.			Why is this 1997 order being included in the Title V permit?
Appendix U, Unregulated Emissions Units and/or Activities	#2 fuel oil storage tank (34,500 gallon capacity)	#2 fuel oil storage tank (20,000 gallon capacity)	Unregulated Emissions Units and Activities were not specified in existing Title V permit.	Please correct the capacity of the fuel oil storage tank.
Appendix U, Unregulated Emissions Units and/or Activities	One gasoline fuel storage "Day" tank (500 gallon capacity)	One gasoline fuel storage "Day" tank (1000 gallon capacity)	Unregulated Emissions Units and Activities were not specified in existing Title V permit.	Please correct the capacity of the gasoline storage tank.
EXISTING PERMIT, section III Condition A.1, Permitting Note			{Permitting note: The heat input limitations have been placed in the permit to identify the capacity of each emissions unit for purposes of confirming that emissions testing is conducted within 90-100 percent of the emissions unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate limits and to aid in determining future rule applicability.}	This permitting note was removed from the new Title V permit. Please provide justification for removing the clarifying language and why the intent of the condition was changed.

Please contact me at 724-597-8631 if you have concerns or questions related to this submittal. We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle F. Duncan". The signature is fluid and cursive, with the first name being the most prominent.

Michelle F. Duncan
Sr. Air Quality Specialist

cc: Tom Cascio, FL DEP
Gary Mauzy
Keith Schmidt
Denny Shaulis